

Case Number: 1:19 - CV - 00571 ( FB ) (PK)

<b>PROPOSED DISCOVERY PLAN</b>			
	<b>DONE</b>	<b>NOT APPLICABLE</b>	<b>DATE</b>
<b>A. ACTIONS REQUIRED <i>BEFORE</i> THE INITIAL CONFERENCE</b>			
1. Rule 26(f) Conference held			June 25, 2019
2. Rule 26(a)(1) disclosures exchanged			June 25, 2019
3. Requests made:			
a. Medical records authorization	N/A		
b. Section 160.50 releases for arrest records	N/A		
c. Identification of John Doe/Jane Doe defendants	N/A		
d. Proposed Stipulation of Confidentiality	Yes		
4. Procedures for producing Electronically Stored Information (ESI) discussed	Yes		
<b>B. SETTLEMENT</b>			
1. Plaintiff to make settlement demand	No		
2. Defendant to make settlement offer	No		
3. Referral to EDNY mediation program pursuant to Local Rule 83.8? (If yes, enter date to be completed)	Yes		Aug. 16, 2019 <del>July 18, 2019</del> - report due Aug. 19, 2019
4. Settlement Conference (proposed date)	No		
<b>C. PROPOSED DEADLINES</b>			
1. Motion to join new parties or amend pleadings			July 25, 2019
2. Initial documents requests and interrogatories			Aug. 30, 2019 <del>July 30, 2019</del>
3. All fact discovery to be completed (including disclosure of medical records)			Oct. 16, 2019 <del>September 16, 2019</del>
4. Joint status report certifying close of fact discovery and indicating whether expert discovery is needed			October 18, 2019
5. Expert discovery (only if needed)	Check here if not applicable <input checked="" type="checkbox"/>		

Plaintiff expert proposed field of expertise:	N/A		
Defendant expert proposed field of expertise:	N/A		
	<b>DONE</b>	<b>NOT APPLICABLE</b>	<b>DATE</b>
a. Case-in-chief expert report due		X	
b. Rebuttal expert report due		X	
c. Depositions of experts to be completed		X	
6. Completion of ALL DISCOVERY			<del>Oct. 16, 2019</del> Sept. 16, 2019
7. Joint status report certifying close of all discovery and indicating whether dispositive motion is anticipated			Oct. 18, 2019
8. If District Judge requires Pre-Motion Conference, date to make request			Oct. 25, 2019
9. If District Judge does not require Pre-Motion Conference, date to submit briefing schedule			<del>Oct. 15, 2019</del>
10. Joint Pre-Trial Order due (if no dispositive motion filed)			<del>Nov. 15, 2019</del> Oct. 15, 2019
<b>D. CONSENT TO MAGISTRATE JUDGE JURISDICTION</b>			
1. All parties consent to Magistrate Judge jurisdiction for dispositive motion?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. All parties consent to Magistrate Judge jurisdiction for trial?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>E. COLLECTIVE ACTION AND CLASS ACTION MOTIONS ONLY</b>			
1. Motion for collective action certification in FLSA cases			
a. Response due		X	
b. Reply due		X	
2. Motion for Rule 23 class certification		X	
a. Response due		X	
b. Reply due		X	

This Scheduling Order may be altered or amended only upon a showing of good cause based on circumstances not foreseeable as of the date of this order.

SO ORDERED:

Peggy Kuo  
PEGGY KUO

United States Magistrate Judge

6/25/19  
Date